## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

PMG Data Services, Inc.,	)
Plaintiff,	)
,	) Case No. 08 C 854
V.	)
	) Honorable Judge Norgle
Robert J. McNally and	)
Hallmark Data Systems LLC,	) Magistrate Judge Ashman
	)
Defendants.	)

## <u>DEFENDANT HALLMARK DATA SYSTEMS' UNOPPOSED MOTION FOR</u> <u>EXTENSION OF TIME IN WHICH TO FILE RESPONSIVE PLEADING</u>

Pursuant to Rules 6(b) of the Federal Rules of Civil Procedure, Defendant Hallmark Data Systems, LLC, hereby respectfully requests an extension of time in which to file its responsive pleading to Plaintiffs' Complaint. In support of its motion, Defendant states as follows:

- 1. This Complaint was served on Defendant's registered agent on March 24, 2008;
- By Defendant's calculation, its responsive pleading is due on or before today,
   April 14, 2008;
- 3. Counsel for Defendant is in the process of withdrawing as a partner in the undersigned firm and joining the law firm of Ogletree, Deakins, Nash, Smoak & Stewart, P.C. As a result of this transition and the necessity of having files transferred, Defendant respectfully requests twenty (20) additional days, up to and including, Monday, May 5, 2008, to file its responsive pleading to Plaintiffs' Complaint.
  - 4. Plaintiff has no objection to this request.
- 5. By this Motion, Defendant does not intend to waive any defenses it may otherwise have to Plaintiffs' Complaint and hereby specifically preserves all such defenses.

WHEREFORE, Defendant Hallmark Data Systems, LLC, respectfully requests this Court grant its motion for an extension of time in which to file its responsive pleading, up to and including Monday, May 5, 2008.

Respectfully submitted,

HUSCH BLACKWELL SANDERS LLP

By \_\_\_\_\_/s R. Lance Witcher\_

R. Lance Witcher #90785565 720 Olive Street, 24th Floor St. Louis, Missouri 63101 Telephone: (314) 345-6214

Facsimile: (314) 345-6060

Attorney for Defendant Hallmark Data Systems, LLC

## **CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies the foregoing was filed via the Court's CM/ECF System and thereby electronically served on this 14<sup>th</sup> day of April, 2008, upon:

Adam L. Saper Hinshaw & Culbertson LLP 222 N. LaSalle Street, Suite 300 Chicago, IL 60601 Jeffrey D. Hupert Riordan, Fulkerson, Hupert & Coleman 30 North LaSalle Street, Suite 2630 Chicago, Illinois 60602

s/R	Lance	Witcher
5/11.	Lance	** Iteliel